



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:AG
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 21, 2018

By ECF

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William B. Purpura, Esq.
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Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

The government's next production of supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure is enclosed. This production includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57. The government is also producing draft transcripts pursuant to the parties' September 12, 2017 signed stipulation. This discovery production supplements previous productions on February 14, 2017, March 8, 2017, April 10, 2017, May 5, 2017, June 7, 2017, July 21, 2017, August 11, 2017, September 19, 2017, October 17, 2017, November 7, 2017, November 21, 2017, January 19, 2018, February 12, 2018, March 19, 2018, April 16, 2018, May 18, 2018, May 25, 2018, June 05, 2018, June 25, 2018, August 10, 2018, September 14, 2018, October 05, 2018, October 10, 2018, October 16, 2018, October 19, 2018, November 2, 2018, November 16, 2018, November 25, 2018, December 7, 2018, and December 19, 2018. The government also requests reciprocal discovery from the defendant.

Government Discovery

000333812-000333812	Financial Records
000333813-000333814	Defendants MCC calls

Delayed Disclosure Discovery

000333752-000333752	Photos of the defendant
000333753-000333762	Documents
000333763-000333764	Photos
000333765-000333767	Maps
000333815-000334056	Transcript of Recording
000334057-000334134	Draft Transcript
000334135-000334135	Recordings

This letter serves as notice under Federal Rule of Evidence 902(11) that the government intends to offer the certified business records identified above at trial.

If you have specific questions about the government's discovery productions, please reach out to the prosecution team.

Very truly yours,

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cc: Clerk of the Court (BMC) (by ECF) (without enclosure)

Enclosure